	At-risk PAHP	Non-Risk PAHP	State Plan Brokerage Option	All Administrative Match
Federal Authority	Managed care waiver, waiving freedom of choice	Managed care waiver, waiving freedom of choice	State Plan Amendment	State Plan Amendment
How does it work?	The broker would arrange most cost effective transportation, working with the regional providers.	There could be a contract with each regional provider; this would need to be discussed further.	Brokers other than the FSRTPs required in "urban" counties in order to avoid provider self referral. FSRTPs could bid for brokerage in rural counties and self-refer if no other viable transportation options.	Continue current structure; allow self-referral and no broker
Full Federal Match?	Yes • Program match (FMAP) for all costs.	No • Administrative match (50%) for portions CMS determines to be administrative, including base rates.	 No Administrative match (50%) for portions CMS determines to be administrative, including base rates. Reimbursement to members, family and friends matched at administrative (50%) rate. Volunteer reimbursement matched at administrative (50%) rate unless volunteers enrolled as individual provider, which would not be feasible. 	No • Administrative match (50%) for all costs.
FMAP Impact	Zero Impact	\$1.2M + financial risk to state for costs above the Upper Payment Level.	\$4.5M	\$6.1M
Additional Fiscal Impact	 Actuarial Costs RFP Completion of Waiver On-going costs of administering PAHP 	 Development of new payment methodology RFP Completion of Waiver On-going costs of administering PAHP Possible risk involved to costs above the UPL 	 State Plan Amendment RFP On-going costs of administering the brokerage 	No additional costs, as current system could be used
Ensures Full Member Access?	 Yes Bidders would need to meet CMS PAHP requirements, including 24/7 access and response to urgent care requests. Maintains all existing modes of transportation at FMAP. 	 No Current providers would have difficulty meeting CMS PAHP requirements, including 24/7 access and response to urgent care requests. Maintains all existing modes of transportation 	At current levels Brokers not required to ensure 24/7 access or respond to urgent care requests. Maintains all existing modes of transportation.	 At current levels Brokers not required to ensure 24/7 access or respond to urgent care requests. Maintains all existing modes of transportation.
Additional Advantages & Concerns	Advantages + Streamlined administration + Broker at risk, held accountable for attaining quality benchmarks + Enhanced, consistent reporting	Advantages + Potential of stability for FSRTPs, if they meet PAHP requirements and win competitive bids.	Advantages + Potential streamlined if statewide (vs. regional) brokerage. + Could negotiate quality measures, 24/7 access. + Current providers could continue broker/ provider status in rural areas if they won the bid and if no other providers were available/ adequate.	Advantages + Stability for FSRTPs. + Maintains all existing modes of transportation
	Concerns - Potential destabilization of FSRTPs, even under regional PAHPS, since FSRTPs may be unlikely to meet PAHP requirements or win bid(s). - Regional At-Risk PAHPs would create administrative burden for state	Concerns - State administrative burden if 10 contracts required - Admin burden of cost reports and settlements for both state and providers.	Concerns Prohibitive fiscal impact of covering all base rates, member, family, friends and volunteer reimbursement at 50% Admin match. Potential destabilization of FSRTPs, since even with regional brokerages they may be unlikely to meet recommended access, software and call center requirements to win a bid.	 Concerns Prohibitive fiscal impact of covering all costs at 50% Admin match. Lack of accountability in system. Does not address access issues.